

Proposed Rule: Mandatory Reporting of Greenhouse Gas Emissions
Meeting Documentation Outdoor Power Equipment Institute 5-18-09

Date	Staff Contact Information (Name, email, phone #)	Name of Organization (Attach list of all attendees names and emails if possible)	Summary of Discussion (e.g., applicability, reporting requirements, etc.)	Written Comments Provided? Did they also submit to Docket?	Date sent to EPA- CCD
5/18/09	<p>Melissa Weitz Weitz.melissa@epa.gov</p> <p>Mausami Desai Desai.mausami@epa.gov</p> <p>Kitty Sibold Sibold.katherine@epa.gov</p> <p>Sarah Froman Froman.sarah@epa.gov</p> <p>Tad Wysor Wysor.tad@epa.gov</p>	<p>Amy Lilly - Honda Amy.Lilly@ahm.honda.com</p> <p>John Foster - Stihl Sebastian Strauss - Stihl John.foster@stihl.us</p> <p>James McNew - OPEI jmcnew@opei.org</p> <p>(15 others on the phone-no list available)</p>	<p>Discussed specific elements of the proposed reporting rule including facility definition, portable equipment reporting under mobile or stationary combustion provisions, fleet and waste reporting.</p>	<p>OPEI plans to submit comments</p>	<p>NA</p>

Outdoor Power Equipment Association Agenda Items

- 1) Overview of the Mobile Sources vs Stationary Sources reporting.
- 2) Inter-connection between State reporting and federal reporting requirements.
- 3) Specific triggers that prompt a requirement for stationary source reporting
 - Processes (die casting, forging, etc)
 - Fuel types
 - On-site power generation
 - On-site waste treatment
 - Disposal of waste products

4) Specific Questions we would like to discuss based upon OPEI member input (so far) -

a) On the fact sheet for "General Provisions" it is stated that "Manufacturers of vehicles and engines would report GHG emissions under other existing rules - Does this mean that emissions from these facilities would not be reported, just the vehicle/engine reporting only?

b) When engine testing is conducted at a facility that is required to report or near the thresholds for reporting, would the engine testing be reported with the facility emissions? Or is the emissions from engine testing included in the mobile source reporting? (see a)

c) Is an emergency power generator considered a electrical generation source for facility reporting?

d) How does the various fuels for the manufacturing processes affect the thresholds, such as propane verses natural gas? These different fuels have different CO2e factors thereby affecting the threshold calculations.

e) If electrical power consumption is reported, how would the CO2e be calculated when the source/fuel (Coal, Natural Gas, Hydro, Nuclear) may be unknown? How would the efficiency losses be accounted for in transmission?

f) Are transfer trucks or tractors used to transport goods within a plant included in the facility calculation or assumed to be counted within the mobile source?

g) If contract transportation is used for transport of goods, who reports or how is it reported? Is this included in facility reporting? Or is this included under mobile source reporting? Similarly, if a company owns its own transport fleet, is this reported with the facility or included in mobile source reporting only?

h) Section 98.340 states that Subpart HH includes industrial landfills, except for "hazardous waste landfills and construction and demolition landfills." Are landfills that do not have the potential to emit CH₄, such as landfills that are capped and do not require landfill gas collection or combust systems, and landfills that do not accept or contain materials that will decompose to emit CH₄ exempted?